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**VIA ECF ONLY**

July 9, 2008

Hon. Richard J. Sullivan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 615  
New York, NY 10007

**Re: Said Hajem v. City of New York, et al.,  
07 CV 09491 (RJS)(DFE)**

Dear Honorable Judge Sullivan:

We write to request a 60 day extension of each of the various discovery deadlines in the above referenced matter.

The parties have served interrogatories and requests for production. As of this date, neither party has responded. The parties have conferred and expect to have their initial respective production substantially completed by July 21, 2008.

Currently, the deadline for completion of depositions and requests to admit is set for August 18, 2008. Due to the number of depositions potentially required in this action and plaintiff's counsel's vacation, we respectfully request depositions allowed until October 18, 2008, a 60 day extension.

Further, expert discovery for plaintiff will close on September 9, 2008, we request an additional 60 days. The new date would be November 18, 2008 for the close of expert discovery for plaintiff. Expert discovery for defendant will close on October 18, 2008, we request an additional 60 days here as well. The new date would be December 18, 2008 for the close of expert discovery for defendant. December 18, 2008 would also be the close of all discovery.

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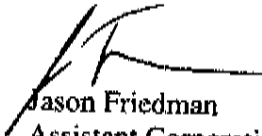
No prior application has been made for extensions of the discovery schedule.

Thank you for your considerations.

Very best regards,



David B. Rankin



Jason Friedman  
Assistant Corporation Counsel  
Attorney for Defendants

DBR/mmt  
cc: Client